

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )

) Case No. 08 CR 625

v. )

) Violations: Title 21, United States Code,  
) Section 846

CARLOS A. CRUZ, )

also known as "Tony;" )

JOEL D. PEREZ; and )

ALEXANDER VASQUEZ, JR. )

**JUDGE NORGLE**  
**MAGISTRATE JUDGE COLE**

**FILED**

09-04-08

SEP - 4 2008

COUNT ONE

The SPECIAL FEBRUARY 2008-2 GRAND JURY charges:

**MICHAEL W. DOBBINS**  
**CLERK, U.S. DISTRICT COURT**

Beginning on or about August 4, 2008, and continuing until on or about August 5, 2008, at  
Arlington Heights and elsewhere, in the Northern District of Illinois, Eastern Division,

CARLOS A. CRUZ, also known as "Tony,"  
JOEL D. PEREZ, and  
ALEXANDER VASQUEZ, JR.,

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, knowingly and intentionally to possess with intent to distribute a controlled substance, namely, 500 grams or more of mixtures and substances containing cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

On or about August 5, 2008, at Arlington Heights, in the Northern District of Illinois, Eastern Division,

CARLOS A. CRUZ, also known as "Tony,"  
JOEL D. PEREZ, and  
ALEXANDER VASQUEZ, JR.,

defendants herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, 500 grams or more of mixtures and substances containing cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2008-2 GRAND JURY further charges:

1. The allegations of Counts One and Two of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 846, as alleged in this Indictment,

CARLOS A. CRUZ, also known as "Tony,"  
JOEL D. PEREZ, and  
ALEXANDER VASQUEZ, JR.,

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds the defendants obtained, directly and indirectly, as a result of the violations; and (2) any and all of property used, and intended to be used, in any manner or part, to commit and facilitate the commission of the violations.

3. The interest of the defendants, subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, includes, but is not limited to the following property:

- a. funds in the amount of \$23,000 seized on August 5, 2008, from a car driven by ALEXANDER VASQUEZ, JR.

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY